

To: Daly, Carl[Daly.Carl@epa.gov]
From: Fallon, Gail
Sent: Thur 8/1/2013 10:17:35 PM
Subject: RE: Question from Sen. Tom Harkin's (D-Iowa) office re WY Regional Haze issue

From p. 33051 of the June 4, 2012 proposal:

Based on our examination of the State's costs estimates, emission reductions, and the predicted visibility improvement, we propose to find that LNBs with OFA plus SNCR at an emission limit of 0.12 lb/MMBtu (30-day rolling average) is reasonable for NOx BART for Basin Electric Laramie River Units 1, 2, and 3. We are proposing that the FIP NOx BART emission limit for Basin Electric Laramie River Unit 1, Unit 2, and Unit 3 is 0.12 lb/MMBtu (30-day rolling average).

Gail Fallon

Environmental Engineer

Air Quality Planning Unit

US EPA, Region 8

Denver, CO

(303) 312-6281

From: Fallon, Gail

Sent: Thursday, August 01, 2013 12:23 PM

To: Daly, Carl

Subject: FW: Question from Sen. Tom Harkin's (D-Iowa) office re WY Regional Haze issue

On second thought, it might be good to include some of the fluff from the comm strat talking points about how we have been working with the state, the benefits of EPA's plan, and more about the public comment process.

Gail Fallon

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From: Dygowski, Laurel

Sent: Thursday, August 01, 2013 11:48 AM

To: Daly, Carl

Cc: Fallon, Gail

Subject: RE: Question from Sen. Tom Harkin's (D-Iowa) office re WY Regional Haze issue

Here are the points I have put together for your comment. It appears they think an initial e-mail will suffice.

History:

- On May 15, 2012, EPA proposed partial approval and partial disapproval of the Wyoming regional haze State Implementation Plan (SIP) and proposed a Federal Implementation Plan (FIP) for the SIP's deficiencies. EPA was to take final action in late 2012.

In our May 15, 2012 proposed rulemaking, we proposed to disapprove the State's SIP as it pertained to Basin Electric Laramie River Station Units 1-3. The State determined that the best available retrofit technology (BART) for these units was low-NO_x burners (LNBs) with overfire air (OFA). In our May 15, 2012, proposed rulemaking, we proposed a BART FIP for Laramie River Units 1-3 that required the installation of LNBS with OFA and selective non-catalytic reduction (SNCR). The costs we relied on in this action were costs submitted by the State.

- However, based on information submitted during the public comment period, EPA conducted its own cost and visibility improvement analysis and determined that a re-proposal was warranted. On June 10, 2013, we re-proposed action on Wyoming's regional haze SIP. We once again proposed to partially approve and partially disapprove the State's SIP and proposed a FIP for the SIPs deficiencies.
- In our June 10, 2013 proposed action, we proposed a BART FIP for Laramie River Units 1-3 that would require the installation of LNBs with OFA and selective catalytic reduction (SCR). SCR is more expensive than SNCR but achieves greater emission reductions.

Rationale

As stated in our proposed rulemaking, we found that the State's costs and visibility analysis submitted in their SIP did not meet the regional haze rule requirements.

· Based on our analysis of our new cost and visibility modeling information, we determined that more stringent controls were warranted on Laramie River Units 1-3. (Detailed cost and modeling information can be found in our proposed rulemaking notice and in the docket). In our re-proposal, we found that “When considering the cost effectiveness and visibility improvement of new LNBs plus OFA and SCR, it is within the range of what EPA has found reasonable for BART in other SIP and FIP actions.”

Status

- We held public hearings on June 24, 2013, and July 17, 2013, in Cheyenne Wyoming, and July 26, 2013, in Casper, Wyoming.

· Public comments are due on or before August 26, 2013.

· EPA is under a consent decree to take final action on our re-proposal by November 21, 2013

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From: Fells, Sandy

Sent: Thursday, August 01, 2013 10:14 AM

To: Daly, Carl; Fallon, Gail; Dygowski, Laurel

Cc: McGrath, Shaun; Cantor, Howard; Watchman-Moore, Derrith; Videtich, Callie; Smith, Paula; Trulove-Cranor, Whitney

Subject: Question from Sen. Tom Harkin's (D-Iowa) office re WY Regional Haze issue

Importance: High

Hi, Carl, Gail and Laurel – Please let me know if you are able to address this request. Looks like

we'll need an issue paper on Laramie River Station for Kevin in OCIR to forward to Sen Harkin's office and then be available for a follow-up call, if needed. Issue paper will need to be concurred upon all the way up through the RA's office, since this is going through HQ. Deadline on these types of inquiries is usually "asap."

As always, thanks a million!

Sandy

Sandy Fells

Regional Congressional Liaison

EPA, Region 8, Denver

303-312-6604

From: Bailey, KevinJ
Sent: Thursday, August 01, 2013 9:47 AM
To: Ashley, Jackie; Terry, Sara; Fells, Sandy
Subject:

Looping in all those who may be of assistance here...

We received an inquiry from Senator Harkin's office on regulations to address regional haze, specifically requirements focused on the Laramie River Station coal power plant in Wheatland, WY. Apparently, they've been told that the Wyoming DEQ had proposed installation of low NOx burners with overfire air. They were also told that EPA initially accepted this proposal, but shortly thereafter changed its position and now is proposing to require installation of SCR systems.

They'd like to understand this issue from our perspective, including the history, the current status, and the rationale. The Senator's staff thinks this could be accomplished with an email outlining the information, perhaps with a short follow-up call.

Kevin J. Bailey

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